

EPA Registration No.  
7173-286  
vol. 3

Document Processing Desk  
EPA Office of Pesticide Programs (7504P)  
Ariel Rios Building  
1200 Pennsylvania Ave. N.W.  
Washington, DC 20460

Attn: Mr. Mark Suarez, Insecticide/Rodenticide Team 7

28 April, 2015

Re: Annual reporting for Rozol Prairie Dog Bait, EPA Reg. No. 7173-286

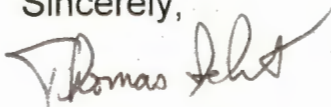
Dear Mr. Suarez,

The "Biological Opinion" rendered by the US Fish and Wildlife Service for Rozol Prairie Dog Bait requires us to submit the enclosed information to you, to be forwarded to FWS. I have enclosed a summary of our sales of this product, for the period of April 1, 2014, through March 31, 2015, reported according to state where the product was shipped. Distributors are free to ship this product to other states, so this report does not indicate where the product was actually used.

I have also enclosed a report showing the date, location and number of attendees at the "stewardship meetings" that Liphatech has conducted since March 15, 2014.

All of the information reported with this letter is considered to be **CONFIDENTIAL BUSINESS INFORMATION**. Please contact me directly at (414) 410-7230 if you have questions concerning this submission.

Sincerely,



Thomas Schmit  
Manager of Regulatory Affairs



# DATA EXTRACTION REQUEST

Reg # 7173-286 Decision # 501281

Description: Amendment

## Material Sent:

- ☒ Electronic Label/Letter Dated 3/11/15 3/24/15  
(See PPLS for electronic file) (CORRECTED)  
CD. NUMBER
- ☐ Stamped Label Dated \_\_\_\_\_ (See jacket)
- ☐ Notification Dated \_\_\_\_\_ (See jacket)
- ☐ New CSF(s) Dated \_\_\_\_\_ (See jacket)
- ☐ Other: \_\_\_\_\_

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: GB

Division: RD

Phone: 347-0235

Date: ~~3-11-15~~ 3/24/15 CORRECTED



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

March 11, 2015

Tom Schmit  
Liphatech, Inc.  
3600 W. Elm Street  
Milwaukee, WI 53209

Subject: Label Amendment – To make a minor revision to the Endangered Species text to reflect the new Bulletins Live! Two program  
Product Name: Rozol Prairie Dog Bait  
EPA Registration Number: 7173-286  
Application Date: March 6, 2015  
Decision Number: 501281

Dear Mr. Schmit:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

Page 2 of 2  
EPA Reg. No. 7173-286  
Decision No. 501281

with FIFRA section 6. If you have any questions, please contact Gene Benbow by phone at 703-347-0235, or via email at [Benbow.Gene@epa.gov](mailto:Benbow.Gene@epa.gov).

Sincerely,

A handwritten signature in dark ink, appearing to read 'MS', with a horizontal line extending to the right.

Mark Suarez  
Product Manager 07  
Invertebrate & Vertebrate Branch 3  
Registration Division (7505P)  
Office of Pesticide Programs

Enclosure

**RESTRICTED USE PESTICIDE**  
**DUE TO HAZARD TO NONTARGET ORGANISMS**  
For retail sale to and use only by Certified Applicators or persons under their  
direct supervision and only for those uses covered by the Certified  
Applicator's Certificate.

# **ROZOL®**

## **PRAIRIE DOG BAIT**

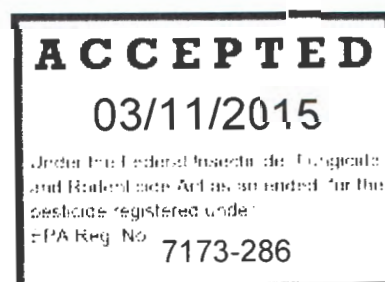
Active Ingredient: chlorophacinone . . . . . 0.005%  
Inert Ingredients . . . . . 99.995%  
Total . . . . . 100.000%

EPA Reg. No. 7173-286

EPA Est. No. 7173-WI-1

**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION:** See side panel for additional precautionary statements.

(Liphatech Logo)  
Liphatech, Inc.  
3600 W. Elm Street  
Milwaukee, WI 53209  
(414) 351-1476



**Net Weight: 1 pound up to 2000 pounds**

**WARRANTY:** To the extent consistent with applicable law, seller makes no warranty, expressed or implied, concerning use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of product when such use and/or handling is contrary to label instructions.

**PRECAUTIONARY STATEMENTS**  
Hazard to Humans and Domestic Animals

**CAUTION:** Harmful if swallowed or absorbed through the skin because it may reduce the clotting ability of blood and cause bleeding. Keep away from children, domestic animals and pets. Do not get in eyes on skin or on clothing. All handlers (including applicators) must wear shoes plus socks, and gloves. Any person who retrieves carcasses or unused bait following application of this product must wear gloves.

**USER SAFETY REQUIREMENTS:** Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash hands thoroughly after applying bait and before eating, drinking, chewing gum, using tobacco or using the toilet and change into clean clothing.

**FIRST AID:** Have label when obtaining treatment advice.

If swallowed: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor.

If on skin: Take off contaminated clothing. Rinse skin with plenty of cool water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

**TREATMENT FOR PET POISONING:** If animal eats bait, call veterinarian at once.

**NOTE TO PHYSICIAN OR VETERINARIAN:** Contains chlorophacinone, an anticoagulant. If swallowed, this material may reduce the clotting ability of the blood and cause bleeding. For humans or dogs that have ingested this product and/or have obvious poisoning symptoms (bleeding or prolonged prothrombin times), give Vitamin K<sub>1</sub> intramuscularly or orally.

**ENVIRONMENTAL HAZARDS:** This product is toxic to fish and wildlife. Dogs and other predatory and scavenging mammals and birds might be poisoned if they feed upon animals that have eaten this bait. Do not apply directly to water, or to areas where surface water is present. Do not contaminate water by cleaning of equipment or disposal of wastes. Runoff also may be hazardous to aquatic organisms in water adjacent to treated areas.

**STORAGE AND DISPOSAL:** Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage:** Store in original container in a cool, dry place inaccessible to children and pets.

**Pesticide Disposal:** Wastes resulting from the use of this product may be disposed of in trash or at an approved waste disposal facility.

**Container Handling:** Nonrefillable container. Do not reuse or refill this container. **[Plastic:]** Completely empty container, then offer for recycling or reconditioning; or puncture and dispose of in a sanitary landfill. **[Paper:]** Completely empty container, then dispose of empty container in trash or at an approved waste disposal facility.

**DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

**READ THIS LABEL** and follow all use directions and precautions. Only use for sites, pests, and application methods specified on this label.

**IMPORTANT:** Do not expose children, pets, or other nontarget animals to rodenticides. To help prevent accidents:

1. Store product not in use in a location out of reach of children and pets.
2. Dispose of product container, unused, spoiled and unconsumed bait as specified on this label.

**Use restrictions:** This product may only be used as follows:

1. **Sites/Pests:** Black-Tailed Prairie Dogs (*Cynomys ludovicianus*) on rangeland and adjacent noncrop areas.
2. **States:** Colorado, Kansas, Montana, Nebraska, New Mexico, North Dakota, Oklahoma, South Dakota, Texas and Wyoming. Do not apply this product within the exterior boundaries of the Crow Reservation or the Blackfeet Reservation in Montana.

3. **Application Method:** Apply bait by hand scoop or a mechanical bait application machine that is designed, constructed and operated in a manner that ensures that bait is properly placed at least 6 inches down the prairie dog burrows. This product may only be used in underground applications. Do not apply bait on or above ground level. Treat only active burrows.

4. **Treatment Period:** Apply between October 1 and March 15 of the following year, when animals will most readily take the grain bait.

5. **Non-Applicators:** Do not allow children, pets, domestic animals or persons not involved in the application to be in the area where the product is being applied.

6. **Grazing Restriction:** Do not allow livestock to graze in treated areas for 14 days after treatment and when no bait is found above ground.

7. Do not use any other rodenticides containing anticoagulants (diphacinone) in prairie dog towns during the treatment period allowed on this label.

**Endangered Species:** It is a Federal offense to use any pesticide in a manner that results in the death of an endangered species. Use of this product may pose a hazard to endangered or threatened species. When using this product, you must follow the measures contained in the Endangered Species Protection Bulletin for the area in which you are applying the product. To obtain Bulletins, no more than six months before using this product, consult <http://www.epa.gov/espp/> or call 1-800-447-3813. You must use the Bulletin valid for the month in which you will apply the product.

**Site Assessment:** Before applying this product, identify active prairie dog burrows by visual observation. The openings of active burrows will generally be free of leaves, seeds, other debris or spider webs, and will show freshly turned earth, and have prairie dog feces nearby.

**Application:** Apply 1/4 cup (53 grams or nearly 2 ounces) of bait at least 6 inches down active prairie dog burrows. Make sure no bait is left on the soil surface at the time of application. Applicator must retrieve and dispose of any bait that is spilled above ground or placed less than 6 inches down the burrow entrance.

**Follow-up:** Prairie dogs that have eaten this bait will begin to die off 4 to 5 days after they eat a lethal amount. The applicator must return to the site within 4 days after bait application, and at 1 to 2 day intervals, to collect and properly dispose of any bait or dead or dying prairie dogs found on the surface. Carcass searches must be performed using a line-transect method that completely covers the baited area. Transect center lines must be not more than 200 feet (about 60 meters) apart, and should be considerably less if searches are conducted in more densely vegetated sites. Transect lines may be traveled on foot or by vehicle at a rate not to exceed 4 mph. All carcasses found above ground must be collected and disposed of properly. Continue to collect and dispose of dead or dying prairie dogs and search for non-target animals for at least two weeks, but longer if carcasses are still being found at that time. Carcass collection should occur in late afternoon, near sundown, to reduce the potential of nocturnal animals finding carcasses and dying animals. Bury carcasses on site in holes dug at least 18 inches deep or in inactive burrows (no longer being used by prairie dogs or other species) to avoid non-target animal scavenging. Burial includes covering and packing the hole or burrow with soil. If burial is not practical (due to frozen ground, etc.) and other disposal methods are allowed by state and local authorities, collected carcasses may be disposed of by other methods to insure that the carcasses are inaccessible to scavengers.

All dead or dying non-target animals must be reported to the National Pesticide Information Center 1-800-858-7378 as soon as possible. Any apparently injured or sick Federally listed species must also be immediately reported by calling 303-236-7540 (if located in Kansas, Nebraska, the Dakotas, Montana, Colorado or Wyoming) or 505-248-7889 (if located in Texas, New Mexico or Oklahoma). The Black-footed Ferret Coordinator must also be contacted if ferrets are found during Rozol Prairie Dog Bait applications or carcass searches at 970-897-2730 x224. If live black footed ferrets are found outside reintroduction sites, before, during or after Rozol Prairie Dog Bait application, the Black-footed Ferret Coordinator must be contacted immediately and sufficient time must be allowed for the FWS to capture and relocate the black-footed ferret(s) before Rozol Prairie Dog Bait application.

**Reapplication:** If prairie dog activity persists several weeks or months after the bait was applied, a second application may be made, by treating burrows in the same manner, time period and procedure as the first application. Follow all application, site assessment and follow-up directions and use restrictions as found above.

## Benbow, Gene

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**From:** Benbow, Gene  
**Sent:** Monday, March 09, 2015 7:06 AM  
**To:** 'Thomas Schmit'  
**Cc:** Michele Brunlinger  
**Subject:** RE: 7173-286 label change

Hi Tom,

I received this and will move it to Mark to enter in the computer system. After that I'll try to get this worked-up and stamped quickly. Thank you for sending this in so quickly –

Sincerely,

Gene Benbow  
Biologist, EPA  
Invertebrate & Vertebrate Branch 3  
Registration Division  
<http://epa.gov/pesticides/>  
703-347-0235

**From:** Thomas Schmit [mailto:SchmitT@liphatech.com]  
**Sent:** Friday, March 06, 2015 12:07 PM  
**To:** Benbow, Gene  
**Cc:** Michele Brunlinger  
**Subject:** RE: 7173-286 label change

Hello Mr. Benbow –

Per your request below, I am submitting the attached documents:

- application for amended registration;
- proposed label, with a single word change conforming to your request,  
With the change marked in a red box on page 3 of the label.

Please confirm that you have received this message and the attachments  
By return email.

Thanks!  
Tom Schmit  
Liphatech, Inc.

**From:** Benbow, Gene [mailto:Benbow.Gene@epa.gov]  
**Sent:** Wednesday, March 04, 2015 11:31 AM  
**To:** Thomas Schmit  
**Cc:** Suarez, Mark  
**Subject:** 7173-286 label change

Hi Tom,

I was alerted earlier about a label change we'll need to do for this label (and the Kaput label). The section which currently reads "...Bulletin for the **county**...." no longer is accurate. The new system isn't county based, but instead allows the user to zoom in to the geography where they plan to apply the pesticide.

Can you submit a label amendment to revise this text to read "...you must follow the measures contained in the Endangered Species Protection Bulletin for the area in which you are applying the product"? We will of course be request the same change for the other product as well.

Thank you for your help in getting this to us –

Sincerely,

Gene Benbow  
Biologist, EPA  
Invertebrate & Vertebrate Branch 3  
Registration Division  
<http://epa.gov/pesticides/>  
703-347-0235



United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☒ Amendment  
☐ Other

OPP Identifier Number

## Application for Pesticide - Section I

1. Company/Product Number <b>7173-286</b>	2. EPA Product Manager Mark Suarez	3. Proposed Classification <input type="checkbox"/> None <input checked="" type="checkbox"/> Restricted
4. Company/Product (Name) <b>Rozol Prairie Dog Bait</b>	PM# Team 7	
5. Name and Address of Applicant (Include ZIP Code) Liphatech, Inc. 3600 W. Elm Street Milwaukee, WI 53209 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

## Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

This amendment is submitted to change a single word on the approved product label, as requested by email from Mr. Gene Benbow. The label change is marked by a red box on the proposed label submitted with this application. This amendment is a non-PRIA action initiated by EPA, with no fee due. Contact: Thomas Schmit, phone 414-410-7230, email schmitt@liphatech.com.

## Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
* Certification must be submitted				<input type="checkbox"/> Glass	<input checked="" type="checkbox"/> Paper
				Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1 pound up to 2000 pounds		5. Location of Label Directions <input checked="" type="checkbox"/> On label	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

## Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Thomas Schmit		Title Mgr of Regulatory Affairs		Telephone No. (Include Area Code) (414) 410-7230	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title Mgr of Regulatory Affairs			
4. Typed Name Thomas Schmit		5. Date March 6, 2015			

Document Processing Desk  
EPA Office of Pesticide Programs (7504P)  
Ariel Rios Building  
1200 Pennsylvania Ave. N.W.  
Washington, DC 20460

Attn: Reubin Baris, Insecticide-Rodenticide Branch

3 April, 2014

Re: Annual reporting for Rozol Prairie Dog Bait, EPA Reg. No. 7173-286

Dear Mr. Baris,

The "Biological Opinion" rendered by the US Fish and Wildlife Service for Rozol Prairie Dog Bait requires us to submit the enclosed information to you, to be forwarded to FWS. I have enclosed a summary of our sales of this product, for the period beginning April 2013, through March 2014, reported according to state where the product was shipped. Distributors are free to ship this product to other states, so this report does not indicate where the product was actually used.

I have also enclosed a report showing the date, location and number of attendees at the "stewardship meetings" that Liphatech conducted since March 2013.

All of the information reported with this letter is considered to be **CONFIDENTIAL BUSINESS INFORMATION**. Please contact me directly at (414) 410-7230 if you have questions concerning this submission.

Sincerely,



Thomas Schmit  
Manager of Regulatory Affairs





Document Processing Desk  
U.S. Environmental Protection Agency  
Document Processing Desk  
Office of Pesticide Programs (7504P)  
Room S4900, One Potomac Yard  
2777 Crystal Drive  
Arlington, VA 22202

Attn: John Hebert, Insecticide-Rodenticide Branch

April 3, 2013

Re: Final printed labels for multiple products

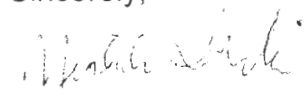
Dear Sir or Madam,

Please find enclosed final printed labels and associated films for the following products:

EPA Reg. No. 7173-113	Rozol Tracking Powder
EPA Reg. No. 7173-151	Rozol Pellets
EPA Reg. No. 7173-172	Rozol Blue Tracking Powder
EPA Reg. No. 7173-187	Maki Paraffinized Pellets
EPA Reg. No. 7173-188	Maki Pellets Place Packs
EPA Reg. No. 7173-189	Maki Paraffin Blocks
EPA Reg. No. 7173-202	Maki Mini Blocks
EPA Reg. No. 7173-205	Hombre Pellets
EPA Reg. No. 7173-208	Maki Bait Packs (Pellets)
EPA Reg. No. 7173-211	Hombre Pellets Place Packs
EPA Reg. No. 7173-218	Generation Mini Blocks
EPA Reg. No. 7173-238	Generation BlueMax Meal Bait
EPA Reg. No. 7173-242	Rozol Vole Bait
EPA Reg. No. 7173-243	Rozol Mini Blocks
EPA Reg. No. 7173-258	FastDraw Soft Bait
EPA Reg. No. 7173-286	Rozol Prairie Dog Bait
EPA Reg. No. 7173-288	Generation BlueMax Mini Blocks
EPA Reg. No. 7173-297	Revolver Soft Bait

Please contact me directly at (414) 410-7235 if you have questions concerning this submission.

Sincerely,



Michele Brunlinger  
Compliance Specialist  
(414) 410-7235 phone  
[brunlingerm@liphatech.com](mailto:brunlingerm@liphatech.com)

